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September 13, 2023

VIA ECF

Hon. Alvin K. Hellerstein, U.S.D.J.  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: Zioness Movement, Inc. v. The Lawfare Project, Inc.**  
**Case No. 1:21-cv-07429**

Dear Judge Hellerstein:

We represent defendant / counterclaim (“defendant”) in this matter and write regarding the Court’s recent communication concerning a trial date of October 3, 2023.

As Your Honor is aware, the date in question falls out during the Intermediate Days of the Succos holiday. A trial on this date would impose a considerable hardship on our client, as well as on the undersigned. Our client’s senior executive, and a person whose testimony has been noticed by both sides, is Brooke Goldstein. Ms. Goldstein resides in Israel and is mother of three young children. Requiring her to travel to New York at this time would impose great difficulties on her family.

A trial on this date would also be difficult for others in the organization, including other witnesses who are observant, as well as for myself as trial counsel. Separate and apart from the material religious strictures concerning working on the Intermediate Days, the responsibilities of being away from home and trying a case before a jury during the festival period would entail substantial hardship on the families of almost everyone on the defendants’ side.

For these reasons we write to request that Chambers coordinate another to schedule this trial for a date after the Jewish holiday season. We appreciate the Court’s consideration of this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ronald D. Coleman", is written over the typed name.

Ronald D. Coleman